

REMARKS

The Office Action dated August 26, 2005 has been fully considered by the Applicant.

Claims 1, 6 and 9 are currently amended. Claims 2-5 are as originally filed. Claims 7, 8 and 10-19 have been previously presented. Claim 20 is new.

Enclosed is a Petition For Three-Month Extension of Time and a check in the amount of \$1020 to cover the cost of the fee.

Figures 3-5 have been objected to for having unclear text. Enclosed are proposed Replacement Sheets having Figures 3-5.

Claims 1, 6 and 9 have been objected to because of informalities. Each claim has been currently amended to correct such informalities.

Claims 1-19 have been rejected under 35 USC 102(e) as being anticipated by United States Patent No. 6,874,119 to Macleod Beck et al. Reconsideration of the rejection is requested.

The '119 Beck et al patent provides an object model that allows access to stored information within a multimedia storage system without the need to invoke the actual media or access the actual multimedia data repository (see Col. 4, lines 43-60). The first and perhaps most important distinction between Applicants' invention and the '119 Beck patent is that Applicants require a process model to be developed rather than an object model.

Applicants provide a way of linking processes provided within the process model with resources which are needed to allow each process to be carried out, for example by an employee. In contrast, the '119 Beck et al patent does not provide a process model but instead provides an object model for accessing stored data.

The multimedia and text data to be retrieved according to the '119 Beck patent are records of interactions between clients and agents within a call center. The Beck patent requires the creation of model which shows a thread of contact between the client and agent which is developed purely as a result of client/agent interactions which have already happened. This is to say that if a client calls a call center, the conversation is recorded. Then if subsequent calls relating to the first call are made, they are recorded and provided on a thread as part of the object model to simplify retrieval of

the related call recordings. This is not a process model as disclosed in Applicants' invention but merely a thread linking stored data representing previous interactions between clients and agents.

Applicants' claims 1 and 6 starts with a process model and then determines what resources will be required to allow a user to carry out processes within the model. This is in contrast to the '119 Beck et al patent that only creates an object model after the interaction between the client and agent has occurred. This distinction is important since in the current invention it allows the process-driven knowledge activation system of the present invention to be open, in that the processes within the process model can be interrelated and mapped to multiple resources via symbols and are not therefore dependent on events which have happened but rather the process model is developed as a result of analysis of the organization which the process model is required to represent and is therefore based on a predictive analysis.

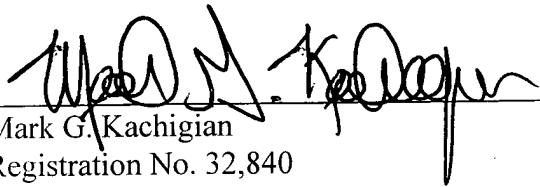
Therefore, Applicants' invention allows identification of which processes require the use of which knowledge resources via the use of auditable symbols which is not possible by the simple linking of threads of stored data according to the Beck et '119 patent. Indeed, Beck et al does not disclose how or why the stored data can be mapped to business processes but merely indicates that the stored data is presented upon request. Thus, it is clear that the Beck et al '119 patent is concerned with the single function of retrieving data and is not concerned with the process level modeling of how business process elements relate to each other and how they relate to available knowledge resources.

By providing symbols according to Applicants' disclosure, an end user is presented only with the information they need in relation to a specific process and is not required to understand the interrelations within the process model, nor where the knowledge resources are to be accessed via a file store. Clearly these features are not taught or suggested in the '119 patent to Beck et al and therefore Applicants sincerely request reconsideration of the rejection.

It is believed that the application is now in condition for allowance and such action is earnestly solicited. If any further issues remain, a telephone conference with the Examiner is respectfully requested. If any fees are associated with this action, the Examiner is authorized to credit deposit account No. 08-1500.

HEAD, JOHNSON & KACHIGIAN

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Mark G. Kachigian', written over a horizontal line.

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